

## **REMARKS/ARGUMENTS**

### **Amendments**

Before this Amendment, claims 9-20 were present for examination. No claims are amended, canceled or added. Therefore, claims 9-20 remain present for examination, and claims 9 and 15 are the independent claims.

The Office Action dated November 15, 2006 ("Office Action") rejected claims 9-20 under 35 U.S.C. §102(e) as being anticipated by the cited portions of U.S. Patent No. 6,614,774 to Wang (hereinafter "Wang"). The Office also objected to the Title, and thus the Title of this application has been amended to overcome the objection. Applicants respectfully request reconsideration of this application.

### **35 U.S.C. §102(e) Rejection, Wang**

The Office Action dated November 15, 2006 ("Office Action") rejected independent claims 9 and 15 under 35 U.S.C. §102(e) as anticipated by Wang. For a valid anticipation rejection, the Office must show that each limitation from the claims appears in a single piece of prior art. Applicants believe significant limitations from independent claims 9 and 15 are neither taught nor suggested in the references.

Specifically, Wang fails to teach or suggest the first and second subnets of the second domain (i.e., the visited domain) and the updating mechanism related thereto, as recited in independent claims 9 and 15.

The Office Action relies on a particular portion of Wang to teach these limitations (Office Action, pp. 2-3, *citing* Wang, col. 7, l. 60 - col. 8, l. 16). But this portion of Wang does not teach or suggest arrangements in which the domains have subnets. Wang does not consider a visited domain divided into two or more subnets, or the updating when the mobile terminal moves between one subnet and another within a visited domain.

In Wang, "the visited network 104 assigns the mobile terminal 128 an IP address via the visited DHCP 122. ... The visited network 104 instructs the visited DNS server 118 to

associate the mobile terminal 128 with the assigned IP address for the duration of the data session. The visited network 104 transmits the assigned IP address local to the visited network 104 to the home network 102 via the private network 124. The home network 102 instructs the home DNS server 110 to associate the assigned IP address with the host name of the mobile terminal 128" (Wang, col. 7, l. 58 - col. 8, l. 7).

But claims 9 and 15 recite a second, visited, domain which includes at least two subnets (i.e., the second and third subnets, as recited in these claims). These claims recite an updating mechanism when the mobile terminal moves to a different subnet of the second domain (i.e., from the second subnet to the third subnet). This is not addressed by Wang, as Wang does not disclose subnets. Compare the present invention, where the domains have subnets, and movement of a mobile terminal between two subnets of a visited domain (i.e., between the second and third subnet referred to in our claim) causes the DNS main server of the second domain to be updated with a third output address, which identifies the third subnet. It is the DNS main server of the *second* domain that is updated for that third subnet. A subnet is not the same as a domain, and the claimed updating mechanism for a mobile terminal moving between subnets of a visited domain is not taught or suggested in Wang.

Wang does not address DNS updating directed at a mobile terminal moving between subnets of a visited domain. Thus, Wang fails to disclose the two level updating mechanism recited in independent claims 9 and 15, wherein the second level is concerned with subnets within a domain, rather than different domains.

In light of the foregoing, Applicants respectfully submit that the specified limitations in independent claims 9 and 15 are allowable for at least the foregoing reasons. Claims 10-14 and 16-20 each depend from these independent claims, and are believed allowable for at least the same reasons as given above. Applicants respectfully request that the rejections be withdrawn.

**CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 303-571-4000.

Respectfully submitted,



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